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FILED VIA ECF

January 6, 2022

The Honorable Loretta A. Preska
United States District Judge, Southern District of New York
United States Courthouse, Courtroom 12A
500 Pearl Street
New York, NY 10007-1312

John S. Goetz
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Re: *Verathon v. Baxley*, Civil Action Nos. 21-mc-794 (LAP) and 21-mc-774 (LAP),
(Related to *Berall v. Teleflex Medical Incorporated, et al.*, CA No. 1:10-cv-0577-LAP)

Dear Judge Preska:

I write on behalf of Defendants Verathon Inc. (“Verathon”) and Teleflex Medical Incorporated (“Teleflex”) (collectively, “Defendants”). Pursuant to Your Honor’s Individual Practices, Defendants seek an order permitting Defendants to file the following documents under seal:

- An unredacted copy of Defendants’ Letter Motion for Pre-Motion Conference regarding Baxley’s failure to comply with this Court’s orders and for sanctions (“the Letter Motion”), filed on January 6, 2022;
- Exhibit 1 to the Letter Motion;

Exhibit 1 to the Letter Motion is a privilege log produced by Baxley as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” The redacted portions of the Letter Motion contain information from Exhibit 1.

Courts in this district have routinely ordered that privileged information be redacted or sealed. *See, e.g., Moshell v. Sasol Ltd.*, No. 1:20-cv-01008-JPC, 2021 WL 67107, *1 (S.D.N.Y. Jan. 4, 2021); *BlackRock Allocation Target Shares: Series S Portfolio v. Wells Fargo Bank, Nat'l Ass'n*, No. 14-cv-09371 (KPF)(SN), 2017 WL 953514, *3 (S.D.N.Y. Mar. 9, 2017); *Diversified Grp., Inc. v. Daugerdas*, 217 F.R.D. 152, 162 (S.D.N.Y. 2003).

Accordingly, Defendants respectfully request that this Court enter and order that the Letter Motion and Exhibit 1 to the Letter Motion may be filed under seal.

Respectfully,

John S. Goetz

SO ORDERED.

Dated: January 7, 2022
New York, New York

Cc: Counsel of Record

LORETTA A. PRESKA

Senior United States District Judge